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*Suzanne L. Walsh*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

<p>SUZANNE L. WALSH, Plaintiff,</p> <p>v.</p> <p>BANK OF AMERICA, N.A., CAPITAL ONE BANK USA, N.A., SPECIALIZED LOAN SERVICING, LLC, and EQUIFAX INFORMATION SERVICES, LLC, Defendant.</p>	<p><b>Case No: 2:15-cv-02353-GMN-GWF</b></p> <p><b>STIPULATION AND PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT’S MOTION TO DISMISS [First Request]</b></p>
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**STIPULATION AND PROPOSED ORDER**

Plaintiff Suzanne L. Walsh (“Plaintiff”), Defendant Bank of America, N.A. (“BANA”) (jointly as the “Parties”), by and through their respective counsel, hereby submit this stipulation for an extension of time for Plaintiff to respond to BANA’s motion to dismiss [ECF No. 7].

WHEREAS, on December 09, 2015, Defendant Capital One Filed a Petition for Removal of Plaintiff’s Complaint for Damages filed in the Eighth Judicial District Court, District of Nevada, ECF No. 1;

WHEREAS, on December 14, 2015, BANA filed its Motion to Dismiss the Complaint, ECF No. 7;

WHEREAS, a Response to BANA’s Motion to Dismiss is due on December 12/31/15, ECF No. 7;

WHEREAS, the Parties are discussing the possible early resolution in this case and it is likely that the Parties will reach a settlement within 30 days.

WHEREAS, this is the first request for an extension of this deadline by the Parties.

[continued on next page]

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NOW, THEREFORE, in consideration of the foregoing, and for good cause,  
IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and  
BANA as follows:

(1) Plaintiff shall have until January 21, 2016 to respond to BANA's Motion to  
Dismiss [ECF No. 7].

**IT IS SO STIPULATED.**

DATED this 31st day of December 2015.

**KAZEROUNI LAW GROUP, APC**

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IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

DATED: January 6, 2016

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**CERTIFICATION OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on December 31, 2015, the foregoing STIPULATION AND PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS [First Request] was served via CM/ECF to all parties appearing in this case.

**KAZEROUNI LAW GROUP, APC**

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